

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

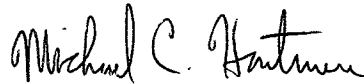
SAS GROUP, INC.,)	
)	
Plaintiff/)	
Counterclaim Defendant,)	
)	
v.)	Civil Action No. 08-CV-6267 (KMK)
)	
LECTENT, LLC)	
)	ECF Case
Defendant/)	
Counterclaim Plaintiff,)	
)	
and)	
)	
EDWARD Z. CAI,)	
)	
Defendant.)	

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the annexed declaration of Edward Z. Cai, dated September 5, 2008, the Memorandum of Points and Authorities in Support of Defendant Edward Z. Cai's ("Defendant Cai") Motion to Dismiss, and upon all the prior pleadings and proceedings had herein, Defendant Cai will move this Court before the Honorable Kenneth M. Karas, United States District Judge, at the United States Courthouse located at 500 Pearl Street New York, New York, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(2), dismissing this action in its entirety with prejudice as to Defendant Cai for lack of personal jurisdiction. Defendant Cai has not transacted business in New York, nor does he have the requisite minimum contacts with New York to satisfy constitutional due process requirements.

Dated: September 5, 2008
New York, New York

Respectfully submitted,



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*Counsel for Defendants Lectent, LLC and
Edward Z. Cai*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of September, 2008, I caused a true and correct copy of the foregoing Notice of Motion to Dismiss to be filed with the Clerk of the Court via the CM/ECF system, which caused notice of such filing to be served on:

Kevin J. Harrington
John T. A. Rosenthal
HARRINGTON, OCKO & MONK, LLP
81 Main Street, Suite 215
White Plains, New York 10601

A handwritten signature in black ink, reading "Michael C. Hartmere". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Michael C. Hartmere